

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SWARTZ CAMPBELL LLC

BY: William T. Salzer/
Identification No. 42657
Two Liberty Place, 28th Floor
50 S. 16th Street
Philadelphia, PA 19102
(215) 564-5190

Attorney for Defendant, Montgomery
Township Municipal Sewer Authority

DAVID WASHINGTON,

Plaintiff,

vs.

U.S. FILTER, DS INDUSTRIES, INC.,
CKS ENGINEERS and
MONTGOMERY TOWNSHIP SEWER
AUTHORITY

Defendants.

CIVIL ACTION

NO. 06-5154

**DEFENDANT MONTGOMERY TOWNSHIP MUNICIPAL SEWER AUTHORITY'S
VOLUNTARY SELF-EXECUTING DISCLOSURES PURSUANT TO RULE 26**

Defendant, Montgomery Township Municipal Sewer Authority ("MTMSA"), by its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 26(a) provides its initial disclosures.

Answering defendant's disclosures are based upon information currently available to defendant. Answering defendant specifically reserves the right to amend or supplement these disclosures as pretrial investigation and discovery continue.

A. Individuals Likely to Have Discoverable Information

1. Jay Marsatia, c/o Montgomery Township Municipal Services Authority
1485 Lower State Road
North Wales, PA 19454

Mr. Marsatia is an employee of the MTMSA and works as a plant operator. Mr. Marsatia has information with regard to his conversations and interactions with plaintiff and the physical conditions of the work site.

2. Andrew Hannon, c/o Montgomery Township Municipal Services Authority
1485 Lower State Road
North Wales, PA 19454

Mr. Hannon is an employee of the MTMSA and works as a plant operator. Mr. Hannon has information with regard to his conversations and interactions with plaintiff and the physical conditions of the work site.

3. Michael Hoffman, c/o Montgomery Township Municipal Services Authority
1485 Lower State Road
North Wales, PA 19454

Mr. Hoffman is an employee of the MTMSA and works as a plant operator. Mr. Hoffman has information with regard to his conversations and interactions with plaintiff and the physical conditions of the work site.

4. Chuck Fealey, c/o Montgomery Township Municipal Services Authority
1485 Lower State Road
North Wales, PA 19454

Mr. Fealey is the superintendent of the MTMSA - Eureka plant. He is knowledgeable regarding the operations of the plant, the work performed at the site by contractors; the contracts entered into with regard to the Eureka Waste Water Treatment plant expansion and renovation; interactions and conversations with David Washington; conversations with local law enforcement authorities pertaining to Mr. Washington's complaint and the physical conditions of the work site.

5. Beverly Brown, c/o Montgomery Township Municipal Services Authority
1485 Lower State Road
North Wales, PA 19454

Ms. Brown is knowledgeable with regard to the overall operations of the MTMSA.

C. Damages

_____ Not applicable.

D. Insurance Policy

The Montgomery Township Municipal Sewer Authority is an insured under a policy of liability insurance issued by National Casualty Company (Policy No. PK00000805) which provides liability limits of \$1,000,000.00.

Respectfully submitted:

SWARTZ CAMPBELL LLC

s/ William T. Salzer

William T. Salzer
Attorneys for Defendant,
Montgomery Township Municipal Sewer Authority

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SWARTZ CAMPBELL LLC

BY: William T. Salzer/Kori A. Connelly
Identification No. 42657/85633
Two Liberty Place, 28th Floor
50 S. 16th Street
Philadelphia, PA 19102
(215) 564-5190

Attorney for Defendant, Montgomery
Township Municipal Sewer Authority

DAVID WASHINGTON,

Plaintiff,

CIVIL ACTION

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AUTHORITY

NO. 06-5154

Defendants

CERTIFICATE OF SERVICE

William T. Salzer, Esquire, hereby certifies that a true and correct copy of the attached Voluntary Self-Executing Disclosure of Defendant, Montgomery Township Municipal Sewer Authority was served upon all interested parties, listed below, electronically and by United States Mail, first class, postage prepaid on March 30, 2007.

Virginia Hardwick, Esquire
Hill Wallack LLP
111 E. Court Street
Doylestown, PA 18901

John P. Shusted, Esquire
Carole A Donahue, Esquire
German, Gallagher & Murtagh
The Bellevue - Suite 500
200 South Broad Street
Philadelphia, PA 19102

Alan D. Berkowitz, Esquire
J. Ian Downes, Esquire
Michael S. Macko, Esquire
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104

Joseph Santarone, Jr., Esquire
Marshall, Dennehey, Warner,
Coleman & Goggin
620 Freedom Business Center
Suite 300
King of Prussia, PA 19406

SWARTZ CAMPBELL LLC

s/ William T. Salzer

William T. Salzer

Attorneys for Defendant,

Montgomery Township Municipal Sewer Authority